

DOCKET NUMBER 32-5

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 Attorneys for Petitioning Creditor
ALAN STANLY

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

In Re:)	Case No. 05-05926-PBINV
)	
FRANCIS J. LOPEZ, an individual,)	Involuntary Chapter 7
)	
Alleged Debtor.)	DECLARATION OF SARAH H. LANHAM
)	IN OPPOSITION TO MOTION BY
)	ALLEGED DEBTOR FOR AN ORDER
)	BIFURCATING TRIAL RE
)	INVOLUNTARY PETITION; SETTING
)	DEADLINE TO ADD NEW PETITION
)	CREDITORS; AND REQUIRING THE
)	POSTING OF A BOND
)	
)	Date: December 19, 2005
)	Time: 10:30 a.m.
)	Judge: Hon. Peter W. Bowie
)	Dept.: Four (4)

I, Sarah H. Lanham, declare as follows:

1. I am an attorney at law, licensed to practice law in the State of California, and admitted to practice before the United States District Court for the Southern District of California. I am an associate with of the firm of Robbins & Keehn, APC, the attorneys of record for Petitioning Creditor Alan Stanly ("Stanly"). I make this declaration based upon first-hand knowledge of the matter hereinafter set forth, which was acquired during the performance of activities that were within the course and scope of the firm's engagement on behalf of Stanly.

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2. Our office previously subpoenaed most of the entities and individuals named by Lopez to be his creditors (the "alleged creditors") in the Declaration of Francis J. Lopez Re Creditors filed on September 19, 2005. We were unable to serve some of the alleged creditors because some had only a post office box listed as an address. We have not yet received all of the documents and information requested by those subpoenas that were issued. Because we have not received all of the requested information from the alleged creditors themselves, we have been required to seek the information from Lopez directly.

3. I prepared a set of written discovery, including a Requests for Admission (Set One), Requests for Documents (Set One) and Interrogatories (Set One), to be served on Lopez in contemporaneously with Stanly's Opposition to the Motion by Alleged Debtor for an Order Bifurcating Trial Re Involuntary Petition; Setting Deadline to Add New Petitioning Creditors; and Requiring the Posting of a Bond.

4. The purpose of this set of written discovery was to obtain information concerning Lopez' alleged creditors to determine whether these entities are in fact creditors and, if so, whether Lopez made preferential payments to them.

I declare under penalty of perjury under that the foregoing is true and correct.
Executed on December 5, 2005, at San Diego, California.

DATE: December 5, 2005

//s// Sarah H. Lanham
SARAH H. LANHAM